

From: Drago, John L (FAA)
Sent: Monday, July 19, 2021 10:12 AM
To: Kelly Neubecker <kellyneubecker@gmail.com>
Cc: Drago, John L (FAA) <John.L.Drago@faa.gov>
Subject: Request for Information. Rize Drone Services, FAA-2021-0057

Ms. Kelly Neubecker
kellyneubecker@gmail.com (preferred email)
kellyneubecker@uasolutionsgroup.com

for:
Justin Anderson
Rize Drone Services
117 Par Place Ste # B
Montrose, CO 81401

Dear Ms. Neubecker:

The following information is required to continue processing your petition for an exemption for Rize Drone Services, FAA-2021-0057. We request you provide the information to us no later than August 2, 2021.

1. On pages one and two of your petition for exemption, you request a maximum operating weight of 45 lbs. with full tanks. Based on review of the specifications sheet and the operations manual provided, I cannot verify that the weight you requested matches the actual weight when tanks are full.

Please clarify the actual weight requested and provide the weight calculation with full tanks. Please note the battery type and weight in the calculation as the operating manual shows a different battery than the specification sheet.

There was a discrepancy in the original manual that was brought to the manufacturer's attention. They have provided us with an updated manual which is attached. The 55 lbs. in the new manual is the maximum recommended takeoff weight. Which means at no time, no matter what the payload, should the aircraft exceed that weight. However, for Rize Drone services purposes, they will remain below the 55 lb. threshold to comply with part 107.

2. During my review of your proposed exemption request, I noted your reference to rule 107.36. It is unclear from your submission whether you intend to disperse hazardous materials and/or economic poisons. As discussed previously, we cannot provide relief from 107.36 based on the language in your petition ("Out of an abundance of caution, the Petitioner requests either; (1) an exemption from 14 C.F.R. 107.36; (2) a finding that no exemption is required; and/or (3) an exemption from 49 C.F.R. 175.9 as explained below.") At a minimum, a petitioner requesting relief from § 107.36 must show that the petitioner intends to dispense a hazardous material in the course of performing an aircraft agricultural operation.

Please indicate whether or not it is your intention to disperse hazardous materials and therefore require an exemption from 107.36.

It is Rize Drone's intention to dispense hazardous materials and/or economic poisons. A copy of the MDS and label is attached.

If you want us to process your request any further, we must receive the information described above by August 2, 2021. If we do not receive the information, we will close the docket without notifying you further. If you have any questions or require additional time you may email us at john.l.drago@faa.gov or call 330-608-3887.

Sincerely,

A handwritten signature in blue ink that reads "John". The script is cursive and fluid.

John L. Drago, Aviation Safety Inspector
Flight Standards Service
General Aviation and Commercial Division
Commercial Operations Branch (AFS-820)

55 M Street, SE, 8th Floor
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